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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SADE GREENE,

Case No.: 2:21-cv-00466-JCM-DJA

Plaintiff,

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT (SECOND
REQUEST)**

EQUIFAX INFORMATION SERVICES, LLC;
TRANS UNION, LLC; EXPERIAN
INFORMATION SOLUTIONS, INC.;
SELF FINANCIAL, INC., d/b/a LEAD BANK;
DOMINION ENERGY, INC.; ATLANTIC
CAPITAL BANK, N.A.; ACCEPTANCE
NOW,

Defendants.

Plaintiff, Sade Greene (“Plaintiff”), and Defendant, Dominion Energy, Inc. (“Dominion”) (collectively the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

On March 23, 2021, Plaintiff filed her Complaint [ECF No. 1]. Dominion was served with Plaintiff's Complaint on March 25, 2021 [ECF No. 16]. Plaintiff and Dominion previously agreed to extend the deadline for Dominion to file its Answer or other responsive pleading to May 25, 2021 [ECF No. 7]. The Parties have discussed extending the deadline for Dominion by an additional twenty-two days to June 16, 2021 to respond to Plaintiffs' Complaint to allow for better investigation of the allegations and discuss possible resolution of the matter.

1 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Dominion,
2 and Atlantic to file their responsive pleadings to Plaintiff's Complaint to June 16, 2021.

3 This is the second motion for an extension of time for Dominion to file its responsive
4 pleadings. The extension is requested in good faith and is not for purposes of delay or prejudice
5 to any other party.

6 As part of this motion Dominion agrees to participate in any Rule 26(f) conference that
7 occurs during the pendency of this extension.

8 DATED this 24th day of May, 2021.

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10 WRIGHT, FINLAY & ZAK, LLP

CONTEMPORARY LEGAL
SOLUTIONS

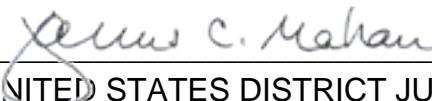
11 */s/ Ramir M. Hernandez*

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18 *Attorneys for Defendants, Self Financial, Inc.*
19 *d/b/a Lead Bank, Dominion Energy, Inc., and*
20 *Atlantic Capital Bank, N.A.*

11 */s/ Robert M. Tzall*

12 Robert M. Tzall, Esq.
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14 2551 North Green Valley Parkway
15 Building C, Suite 303
16 Henderson, NV 89014
17 *Attorneys for Plaintiff, Sade Greene*

18 IT IS SO ORDERED:

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22 UNITED STATES DISTRICT JUDGE

23 DATED: May 26, 2021

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S COMPLAINT (SECOND REQUEST)** on the 24th day of May, 2021, to all parties on the CM/ECF service list.

/s/ Lisa Cox
An Employee of WRIGHT, FINLAY & ZAK, LLP